

THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

LIVEVIDEO.AI CORP
Plaintiff,

vs.

C.A. NO. 1:24-CV-06290
REQUEST FOR JUDICIAL NOTICE

SHARI REDSTONE,
NATIONAL AMUSEMENTS, INC.,
CHRISTINE VARNEY,
MONICA SELIGMAN,
Defendant's.

The Plaintiff urgently requests, under the authority of FRCP Rule 201 that the Court immediately take judicial notice of the critical items presented below in connection with the Plaintiff's Motion To Amend or Withdraw Referral. This is not just any evidence; it is a pivotal representation of the defendants' character and their recent actions—or shocking lack thereof—highlighted by a U.S. Congressional Inquiry. A highly esteemed Senator has publicly weighed in on this matter, underscoring its gravity. The Court must consider this information when it considers public interest determinations regarding the defendants.

1. June 23, 2025 “Motion For Production Of Documents” FCC case #24-275 (Ex. 1)
<https://www.fcc.gov/ecfs/search/search-filings/filing/1062341523808>
Submits U.S. Senator Elizabeth Warren’s May 18, 2025 Congressional Inquiry To Paramount seeking production of materials by June 2, 2025.¹

2. July 9, “Motion To Re-Open Record” FCC case #24-275. (Ex. 2)
<https://www.fcc.gov/ecfs/search/search-filings/filing/107092746904095>
incorporating fully by reference a July 2, 2025 Congressional Inquiry Update

“U.S. Senator Elizabeth Warren (D-Mass.) released the following statement:”
“Paramount has refused to provide answers to a congressional inquiry, so I’m calling for a full investigation into whether or not any anti- bribery laws were broken.”²

¹ “STATEMENT OF FACTS

On May 19, 2025 Shari Redstone as Chair of Paramount Global received a letter from Senators Elizabeth Warren, Bernard Sanders, and Ron Wyden with the purpose being to "request information". The Senators sought Paramount Global to answer nine questions and do so by June 2, 2025. Part of the information requested is regarding Paramount's "policies and procedures related to compliance with 18 U.S.C. 201 and any other laws governing public corruption" The information the Senators requested is exactly the time of information that would facilitate the FCC's Determinations”

² “FCC Must Allow For Record To Be Re-Opened To Allow Congress A Chance To Weigh In Because Applicants Rejected Congressional Request For More Information v.” (Id., at page 6)”

3. “AMENDED MOTION TO ENLARGE THE ISSUE” July 8, 2025 #24-275 (Ex. 3)
<https://www.fcc.gov/ecfs/search/search-filings/filing/10708905508401>

“Newly discovered facts reveal the applicant has fraudulently concealed FEC political contributions while operating a continuing straw donor scheme in violation of 52 U.S. Code § 30122 and in contravention of the applicant’s duty of candor before the FCC”

CONCLUSION

In sum, the above items meet the requirements of Rule 201(b)(2) of the Federal Rules of Evidence, and therefore, the Court must take judicial notice of them pursuant to Rule 201(c)(2) of the Federal Rules of Evidence.

Respectfully Submitted,

DATED: July 15, 2025

By /s/ Alfred C. Constants III

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Attorney For Appellant

EXHIBITS

EXHIBIT #1

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Skydance Media and)	MB Docket No. 24-275
Paramount Global)	
)	

June 23, 2025

MOTION FOR PRODUCTION OF DOCUMENTS

INTRODUCTION

LiveVideo.AI Corp brings this motion to compel applicant Paramount Global Inc. to produce all of the documents which it produced on or about June 2, 2025 as required by the letter from Senators Elizabeth Warren, Bernard Sanders, and Ron Wyden.¹

LEGAL BASIS FOR RELIEF

According to Sec 1.729 (h), the Commission “may allow additional discovery, including, but not limited to, document production, depositions and/or additional interrogatories. In its discretion, the Commission may modify the scope, means and scheduling of discovery in light of the needs of a particular case and the requirements of applicable statutory deadlines.”

STATEMENT OF FACTS

On May 19, 2025 Shari Redstone as Chair of Paramount Global received a letter from Senators Elizabeth Warren, Bernard Sanders, and Ron Wyden with the purpose being to “request information”.

The Senators sought Paramount Global to answer nine questions and do so by June 2, 2025.

Part of the information requested is regarding Paramount’s “policies and procedures related to compliance with 18 U.S.C. 201 and any other laws governing public corruption”

The information the Senators requested is exactly the time of information that would facilitate the FCC’s determinations regarding whether to approve or not approve the requested transfer of broadcast licenses under Case #24-275.

Further, since the applicant has already produced the information it will require no

¹ “To help determine whether Paramount is acting in accordance with our nation’s anti-bribery laws and maintaining journalistic integrity, we ask that you answer the following questions by June 2, 2025” (See attached Exhibit A)

additional costs or resources to also provide a copy of what Paramount Global provided in response to the May 19th Senate request.

In addition, it is clearly in the public interest to get the opportunity to concurrently review the information Paramount Global has already produced and provided to the Senate on June 2, 2025.

CONCLUSION

Petitioner requests the Commission order Paramount Global to submit into the record, the production of information it has provided in response to the May 19, 2025 Senate request for information.

Regards,

/s/ Brad Greenspan

Brad Greenspan

CEO, LiveVideo.AI Corp

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EXHIBIT #2

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of

Skydance Media and
Paramount Global

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MB Docket No. 24-275

July 9, 2025

Motion To Re-Open The Record

PRELIMINARY STATEMENT

Petitioner LiveVideo.AI Corp, submits this Motion To Re-Open The Record for the purposes of allowing the public and other stake holders in to weigh in on whether it is in the public interest to transfer a Federal Broadcast license to new applicants who have made bold claims of contributing over \$20,000,000 in Public Service Announcement (PSA) commercials to aid in resolving a Federal lawsuit that entangled the transferor's esteemed news subsidiary, CBS.

STATEMENT OF FACTS

Various articles have reported on a secret handshake side deal that itself appears unlawful as a general matter:

i. July 2, 2025 “How secret ‘side deal’ helped seal Paramount’s \$16M settlement with Trump — and here’s who deserves the credit”¹ By Charles Gasparino

“Shari Redstone’s Paramount received an unusual assist to settle its controversial lawsuit with President Trump, which should now clear the way for its long-awaited sale to independent studio Skydance, On The Money has learned.

Skydance boss David Ellison, the son of Trump friend and billionaire Oracle co-founder Larry Ellison, stepped up and agreed that once he takes control of the Tiffany Network, currently part of Redstone’s flailing media empire, it will run between \$15 million and \$20 million of public service ads to promote causes supported by the president, a source with knowledge of the negotiations said.

¹ <https://nypost.com/2025/07/02/media/how-secret-side-deal-helped-seal-paramounts-16m-settlement-with-trump/>

“With two major network owners bowing to the president in quick succession, the danger is clear: emboldened politicians and powerful actors will feel more free than ever to weaponize lawsuits and bring regulatory pressure to bear to silence and censor independent journalism,” Richardson said.

“Fox News Digital has learned that the sum being paid to Trump could reach north of \$30 million, with \$16 million being paid upfront for his future presidential library, in addition to another eight-figure allocation set aside for advertisements, public service announcements, or other similar transmissions, in support of conservative causes by the network in the future.”

If the applicants succeed, CBS instantly becomes something less than what it once was, both for those who have made it their lifelong business to buy and sell its airwaves and for those—countless, unseen—who tune in every evening to its news. The internal logic of the transaction is dizzying: a lawsuit, settled not by the typical flow of money but by the flow of words and images, not by checks cut to the plaintiff but by the President’s own ideas pumped into America’s collective headspace at precisely the moments it is most vulnerable.

This is not merely a shuffling of paper assets but a shifting of narrative control, the kind of subtle revolution that does not announce itself as a revolution but instead appears, at first, as an act of bureaucratic kindness, a handshake in the back room of national power.

FCC Must Allow For Record To Be Re-Opened To Allow Congress A Chance To Weigh In Because Applicants Rejected Congressional Request For More Information

v. “JULY 02, 2025”

“Warren Calls for Investigation Into Paramount Settlement with Trump

“Warren: “This could be bribery in plain sight.”

“Today, in response to the news that Paramount Global (Paramount) settled President Trump’s “meritless” lawsuit against 60 Minutes for \$16 million paid to his future presidential library, U.S. Senator Elizabeth Warren (D-Mass.) released the following statement:

“With Paramount folding to Donald Trump at the same time the company needs his administration’s approval for its billion-dollar merger, this could be bribery in plain sight. Paramount has refused to provide answers to a congressional inquiry, so I’m calling for a full investigation into whether or not any anti-bribery laws were broken.”

In May 2025, Senators Elizabeth Warren (D-Mass.), Bernie Sanders (I-Vt.), and Ron Wyden (D-Ore.) wrote to Shari Redstone, Chair of Paramount, with concerns regarding whether Paramount may be engaging in potentially illegal conduct involving the Trump Administration in exchange for approval of its megamerger with Skydance Media (Skydance)."

The FCC Must Allow Stakeholders, Shareholders, Members of Public To Be Heard

Yet everyone on Wall Street, from the most jaded media analyst to the youngest intern in an equities bullpen, immediately saw the other side. The value of CBS—a number that, more than any other, determined the fate of pension funds and mutual funds and the retirements of teachers in Ohio and police sergeants in Fresno—relied on advertisers. Advertisers wanted audiences, and audiences wanted entertainment, or news, or the illusion of both. The moment word got out that CBS was now contractually obliged to cede significant chunks of its broadcast real estate to the President's own propaganda, the value proposition changes. For advertisers, it was not simply a question of whether their own slots would be preempted—though that was bad enough—but of whether the audience would begin to look elsewhere, to other networks not saddled with the surreptitious burden of daily, mandatory PSA interruptions from the federal government.

A more insidious risk lay with the shareholders themselves, who might, as the rumor mill projected, stop wanting to invest, or even to watch, CBS news if they believed that the President—any President—could, through this twenty-million-dollar "settlement," dictate not only what stories made it to air but, more importantly, what stories were systematically countered, diluted, and undermined by an endless stream of "public service" announcements crafted to reframe, trivialize, or directly contradict what the network's own journalists had just reported. It was not difficult to conjure a future where a new incarnation of 60 Minutes, still one of the most respected shows in American journalism, ran unopposed in primetime, its every investigative segment interrupted, or subtly bracketed, by a government-approved PSA: the President, smiling, calm, correcting the record in real time, subtly or overtly criticizing the reporting, or simply redirecting the nation's emotional energy with a well-

EXHIBIT #3

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of

Skydance Media and
Paramount Global

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MB Docket No. 24-275

July 8, 2025

AMENDED MOTION TO ENLARGE THE ISSUE

Preliminary Statement

Petitioner LiveVideo.AI Corp, submits this Amended Motion To Enlarge The Issue pursuant to 47 CFR § 1.229 in Case No 24-275.¹ Newly discovered facts reveal the applicant has fraudulently concealed FEC political contributions while operating a continuing straw donor scheme in violation of 52 U.S. Code § 30122 and in contravention of the applicant's duty of candor before the FCC. In 2011, NBC suspended then terminated an employee, Keith Olbermann for violating its political contribution policy with a single \$2800 political donation. (See Declaration In Support, Ex. 6) As reported herein, the applicant's political contribution of more then \$500,000 in 2020 if not fraudulently concealed, would have certainly resulted in termination by NBC.

In 2020, the applicant sidestepped FEC disclosure requirements while orchestrating one or more NBC news distortions targeting and harming the Republican Presidential candidate just a few weeks prior to the election. This action helped the political party applicant Jeffrey Shell backed to secure a victory in a closely contested Presidential election. Therefore, the applicants lack the necessary FCC character requirements by failing their "basic and well known" duty of candor²

1. The applicants' actions warrant:
 - a. Further investigation
 - b. Potential penalties or sanctions
 - c. Reconsideration of their application status
3. The discovered scheme impacts:
 - a. The integrity of the application process
 - b. Public interest considerations

¹ Petitioner had requested not to disseminate the July 3, 2025 motion after discovery on an error after submission.

² See *Sea Island Broadcasting Corp. v. FCC*, 627 F.2d 240, 243 (D.C. Cir. 1980), cert. denied, 449 U.S. 834 (1980) ("Sea Island").

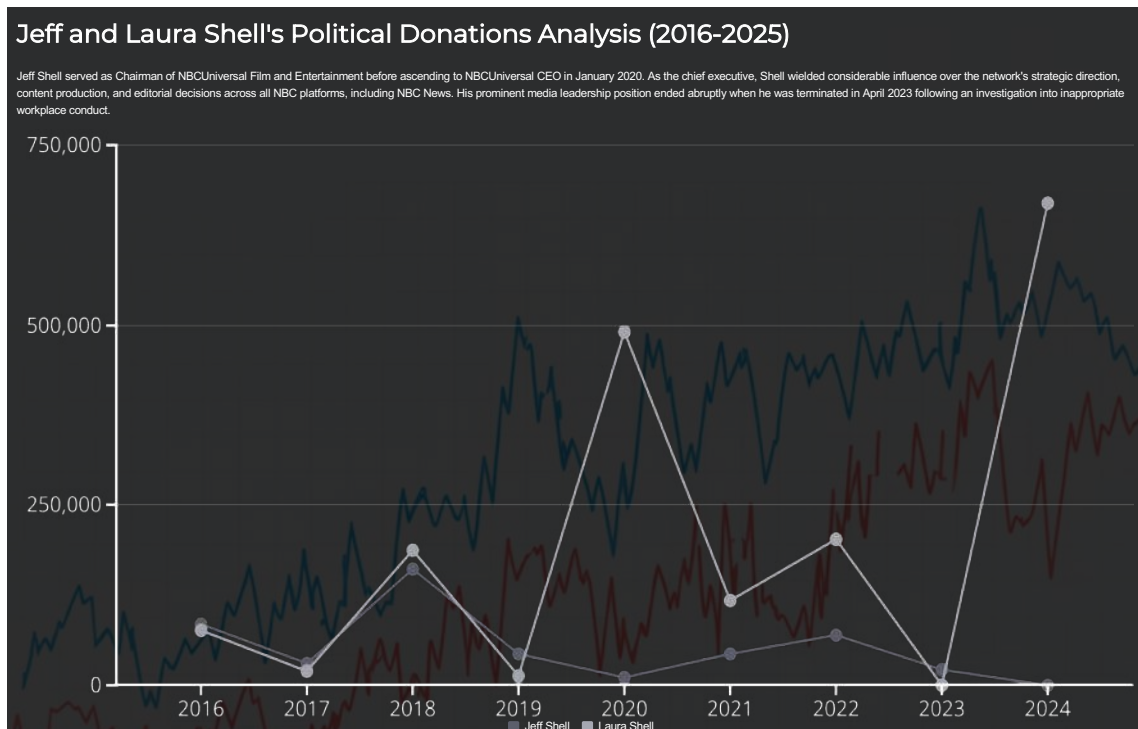
c. Compliance with FCC regulations and federal law

The ongoing scheme involves systematic violation of 52 U.S. Code § 30122 through the deployment of a straw donor mechanism to obscure Applicant Jeffrey Shell's contributions to Democratic political candidates that began sometime in 2019 and is ongoing.

After departing NBC, Shell, who had amassed \$48.1 million in NBC compensation from 2020 to 2022, was ideally positioned to resume making political contributions without resorting to his "homemaker" straw donor tactic. He could have straightforwardly written checks under his own name, both legally and openly. However, Shell, seemingly driven by a desire to impact the media landscape, believed he would be more appealing as a corporate news executive by continuing to deceive the public. This deception had become integral to his professional persona, a meticulously crafted facade he was unwilling to give up.

Newly discovered evidence includes (i) 2024 Presidential contribution information FEC made available in 2025 (See Declaration In Support, Ex. 7) (ii) a White House April 24, 2025 Presidential Memorandum alerting the public to “straw donors” active during the 2024 election cycle that the Attorney General is investigating after a “congressional investigation revealed significant fraud schemes”.

The newly discovered available evidence provides proof the applicant continues to operate a straw donor scheme in violation of 52 U.S. Code § 30122. The scheme was used to conceal the fact that the applicant Jeffrey Shell from approximately January 2020 through April 2023, was an NBC senior executive making large donations strictly to Democrat political candidates. This scheme benefitted Jeffrey Shell by making the public believe Shell was being careful to minimize and decrease any political giving so that the public perceived NBC news broadcasts including Presidential debates were being overseen and managed by nonpartisan individuals. NBC sought to create trust amongst viewers watching its programming and the belief NBC employed unbiased senior executives was one key to accomplishing its goal of building trust with the public.



Jeff Shell's Political Donation Analysis: 2016-2024

Jeff Shell served as Chairman of NBCUniversal Film and Entertainment before his promotion to NBCUniversal CEO, a position he held until April 2023. Throughout his tenure, Shell wielded considerable influence over the network's operations and editorial direction, including NBC News. Examining his political contributions provides valuable insight into his potential affiliations and influences during this critical period.



2016-2019: Early Donation Period

During this timeframe, Jeff Shell contributed \$444,239 to political causes, with his most significant giving occurring in 2018 (\$286,539.90). Concurrently, his wife Laura donated \$279,596.31, with her highest contribution also coming in 2018 (\$186,396.31). This period represents a coordinated approach to political giving by the couple.



2020-2024: Later Donation Period

Jeff's political giving decreased markedly to \$141,850 total, while Laura's contributions increased exponentially to \$1,478,451,849. This dramatic reversal represents a fundamental shift in the couple's donation strategy, coinciding with Jeff's elevation to CEO and subsequent departure in 2023.



Jeff Shell's Donation Pattern

Jeff's political contributions exhibit considerable variability, peaking in 2018 before steadily declining. This downward trend accelerated after his elevation to NBCUniversal CEO, with minimal giving in 2020 (\$10,000) and no recorded donations in 2024. His reduced political activity aligns with his professional trajectory and subsequent departure from NBCUniversal.



Laura Shell's Donation Pattern

Laura's giving trajectory presents a stark contrast to her husband's. While modest during 2016-2019 (\$279,596.31), her political contributions surged dramatically in the 2020-2024 period, totaling \$1,478,451,849. Her most substantial single-year donations occurred in 2024 (\$668,412) and 2020 (\$490,000), precisely when Jeff's contributions were diminishing.

Jeffrey Shell in fact between January 2020 thru his termination in April 2023 manipulated or conspired to manipulate NBC Presidential Debates by personally selecting moderators with demonstrable bias, encouraging NBC employees to rig the debates in favor of the political candidates he personally supported, and took other calculated actions to skew NBC public news broadcasts for partisan advantage such as creating biased post debate coverage broadcasts, all while concealing over \$450,000 in 2020 contributions to organizations directly aligned with Democratic debate preparation efforts.³

After leaving NBC, Shell in 2024 effectively put himself in the position to take over a similar role at CBS and proceeded to use the same straw donor scheme to conceal \$668,000+ in donations to Democratic Presidential candidates in 2024. Shell's wife who had donated no

³ Petitioner believes it has identified all of the FEC data but the figures cited herein may not have recorded all the contributions made by the applicants discussed herein based on the volume, the efforts by the applicants to conceal their scheme by using multiple states, and the delays by the FEC for releasing the complete 2024 and 2025 individual contribution data. It is also not infeasible one or more duplicate records have been captured resulting in non-material differences in totals cited herein and in the report attached as part of the Declaration In Support and fully incorporated herein.